

Alan I. Schimmel, Esq. SBN 101328  
 Michael W. Parks, Esq. SBN 154531  
 Stacey R. Cutting, Esq. SBN 265993  
 SCHIMMEL & PARKS, APLC  
 15303 Ventura Blvd., Suite 650  
 Sherman Oaks, CA 91403  
 Telephone: 818.464.5061/Facsimile: 818.464.5091

Attorneys for Plaintiff BARBARA R. RUCH

Fraser A. McAlpine, Esq. SBN 248554  
 Angel R. Sevilla, Esq. SBN 239072  
 Conor J. Dale, Esq. SBN 274123  
 JACKSON LEWIS, P.C.  
 50 California Street, 9<sup>th</sup> Floor  
 San Francisco, CA 94111  
 Telephone: 415.394.9400/Facsimile: 415.394.9401

Attorneys for Defendant AM Retail Group, Inc. dba  
 G.H. Bass & Co.

UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

BARBARA R. RUCH, an individual, on	)	Case No. 3:14-cv-05352-MEJ
behalf of herself and all others similarly	)	[Assigned to Dept. 18, Hon. Maria-Elena James]
situated, and on behalf of all other “aggrieved”	)	
employees,	)	
	)	<b>STIPULATION AND [PROPOSED]</b>
Plaintiffs,	)	<b>ORDER CONTINUING MEDIATION</b>
	)	<b>COMPLETION DATE AND CASE</b>
vs.	)	<b>MANAGEMENT CONFERENCE</b>
	)	
AM RETAIL GROUP, INC., individually and	)	
dba. G.H. Bass & CO., and DOES 1-50,,	)	
	)	
Defendants.	)	

Pursuant to Local Civil Rules 6-2, Plaintiff Barbara R. Ruch, (“Plaintiff”) and Defendant  
 AM Retail Group, Inc. , (“Defendants”), by and through their respective counsel, and hereby  
 stipulate as follows:

WHEREAS, the court issued a Case Management Order on February 26, 2015;

WHEREAS, the court set a mediation completion date in this matter for July 15, 2015;

WHEREAS, the Court scheduled a Case Management Conference for August 6, 2015;

**STIPULATION AND [PROPOSED] ORDER CONTINUING MEDIATION  
 COMPLETION DATE AND CASE MANAGEMENT CONFERENCE**

WHEREAS, the Court ordered that parties file a case management statement by July 30, 2015;

WHEREAS, the parties request a 45 day continuance of the mediation completion date, and Case Management Conference date and other related dates in order to coordinate and conduct depositions of witnesses who will be traveling from out of state to California.

WHEREAS, based on the schedules of counsel and witnesses, the parties are currently scheduling these depositions for the week of July 20<sup>th</sup> in San Francisco;

AND, WHEREAS the parties agree that the continuance will facilitate and accommodate the discovery and depositions needed to assist the parties with mediation and class certification issues;

NOW, THEREFORE, the Parties stipulate and agree that the mediation completion date shall be continued to at least August 31, 2015; if the parties are unable to resolve the matter at mediation they shall file a joint Case Management Statement by September 14, 2015; the Court's case management conference shall be continued for approximately 45 days to September 21, 2015, or to another date thereafter that is convenient for the Court. The Parties further stipulate that all deadlines contained in the Court's "Case Management Order" shall comport with the continued Case Management Conference date.

IT IS SO STIPULATED.

DATED: June 4, 2015

SCHIMMEL & PARKS  
A Professional Law Corporation

/s/Michael W. Parks

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Alan I. Schimmel  
Michael W. Parks  
Stacey R. Cutting  
Attorneys for Plaintiff BARBARA R. RUCH

DATED: June 4, 2015

JACKSON LEWIS P.C.

/s/Fraser A. McAlpine

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Fraser A. McAlpine  
Angel R. Sevilla  
Conor J. Dale  
Attorneys for Defendant AM Retail Group, Inc.

**STIPULATION AND [PROPOSED] ORDER CONTINUING MEDIATION  
COMPLETION DATE AND CASE MANAGEMENT CONFERENCE**

**ORDER**

The Court, having reviewed the Stipulation and proposed Order Continuing the Mediation Completion Date and the Case Management Conference, and good cause appearing therefore, makes the following Order:

The mediation completion date shall be continued to August 31, 2015, and the Case Management Conference currently scheduled for August 6, 2015, is hereby continued to September 21, 2015 at 10:30 a.m., and all deadlines contained in the Court's "Case Management Order" shall comport with the continued Case Management Conference Date.

IT IS SO ORDERED.

Dated: June 4, 2015



MARIA ELENA JAMES  
United States Magistrate Judge